

Exhibit 3

GF

GARBARINI FITZGERALD P.C.

250 Park Avenue
7th Floor
New York, New York 10177
Phone: 212.300.5358
Fax: 888.265.7054
www.garbarinilaw.com

SUBJECT TO FRE 408

May 1, 2020

NOTICE OF LITIGATION

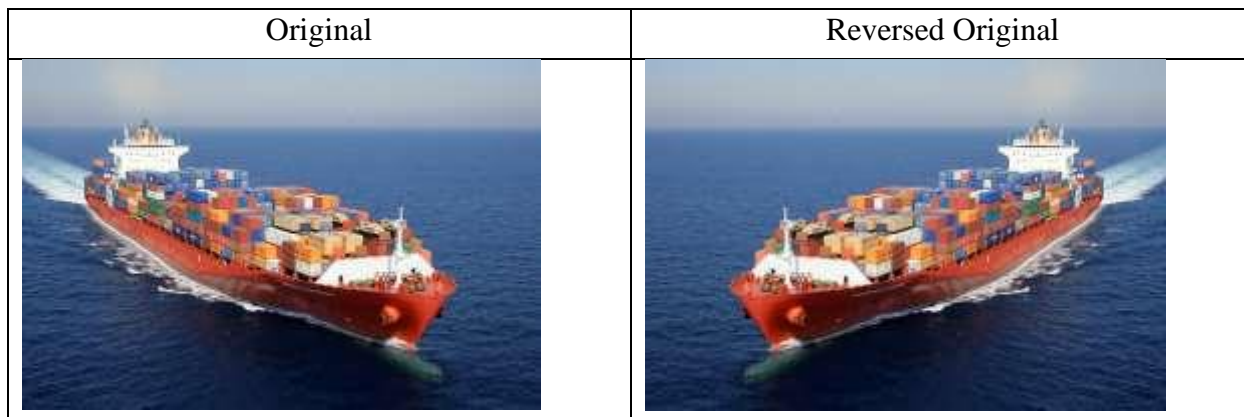
VIA EMAIL to hege.ask@nhst.com; NHSTGlobal.privacy.officer@nhst.com.
and FIRST CLASS MAIL

NHST Media Group
d/b/a Trade Winds
1010 Washington Blvd., 2nd Floor.
Stamford, CT 06901

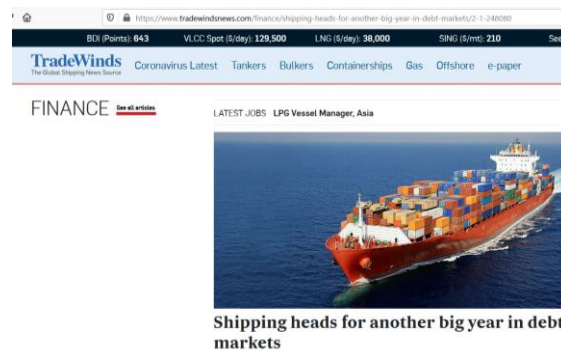
Re: Simon J. Burchett Photography, Inc. adv. NHST Media Group A/S d/b/a Trade
Winds (“NHST”)

Ms. Ask:

I represent Simon J. Burchett Photography, Inc. the beneficial owner of the copyrighted
image of the containership Dubai Express, U.S. Copyright Registration No. VA 2-019-846 shown
below.



NHST, without license or authority, created an unlicensed derivative by flipping the original and cropping it. This as well as the unlicensed copying, distribution and public display of the Copyrighted Image clearly infringes my client's rights in the Copyrighted Image. Below is the unlicensed derivative on the Tradewinds News site locate at <<https://www.tradewindsnews.com/finance/shipping-heads-for-another-big-year-in-debt-markets/2-1-248080>>.



THST's creation of an unlicensed derivative, copying, distribution, and public display, infringes on my client's exclusive rights pursuant to Section 106 of the Copyright Act. See 17 U.S.C. § 106. The fact that THST never sought a license, failed to include an attribution, and cropped the image, are deliberate acts done with reckless disregard to my client's rights, entitling my client to enhanced statutory damages of as much as \$150,000 but in no case less than \$30,000 pursuant to 17 U.S.C. § 504(c). The failure to include an attribution and the removal of all the embedded copyright management information is also a violation on the Digital Millennium Copyright Act (the "DMCA"), 17 U.S.C. § 102, entitling my client to up to \$25,000 per violation.

The fact that NHST stores its data with Google, Inc. in the United States, has a U.S. representative, and has committed an intentional infringement of my client's rights means we will not only get jurisdiction over NHST, but we can seize assets of NHST in the United States.

Provided THST contacts me prior to 5:00 pm on May 8, 2020, we can discuss a possible pre-litigation resolution. If not, we have no choice but to immediately file against THST in the Federal Court for the Southern District of New York. I can be reached at rgarbarini@garbarinilaw.com or at 212.300.5358. In the interim, THST is required to preserve all documents including web pages, in States, their original condition, or face a possible spoliation charge at the trial of this action.

GARBARINI FITZGERALD P.C.

By: Richard M. Garbarini
Richard M. Garbarini

cc: THST, Christian Krohgs gate 16 Postboks 1182 Sentrum 0107 Oslo, Norway